United States District Court

FOR THE NORTHERN DISTRICT OF CALIFORNIA

VENUE: SAN FRANCISCO

FILED

Jun 11 2024

Mark B. Busby CLERK, U.S. DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA SAN FRANCISCO

UNITED STATES OF AMERICA,

٧.

ADEDEJI SHAMONDA

DEFENDANT(S).

INDICTMENT

18 U.S.C. § 242 – Deprivation of Rights Under Color of Law (Two Counts)

| A true bill. | |
|-------------------------------|------------------|
| /s/ Foreperson of the Grar | nd Jury |
| • | Foreman |
| Filed in open court this 11th | day of |
| June 2024 | ·_ |
| | Clain Kardian |
| | Clerk |
| W8 | Bail, \$ Summons |
| Hon. Laurel Beeler, Magis | strate Judge |

| | Case 3:24-cr-00319-CRB Docume | ont 1 Filed 06/11/2/ | D 0 -f 0 |
|-----|--|---|--|
| | Cuse 5.24-61-00519-CIVD DOCUM | CHE 1 HOU 00/11/24 | FILED |
| | | | Jun 11 2024 |
| 1 | ISMAIL J. RAMSEY (CABN 189820) United States Attorney | | Mark B. Busby CLERK, U.S. DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA |
| 2 | | | SAN FRANCISCO |
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| 8 | UNITED STATI | ES DISTRICT COURT | |
| 9 | NORTHERN DISTRICT OF CALIFORNIA | | |
| 10 | SAN FRANCISCO DIVISION | | |
| 11 | UNITED STATES OF AMERICA, |) CASE NO. 3:24-cr-(| 00319 CRB |
| 12 | Plaintiff, |) <u>VIOLATIONS</u> :) 18 U.S.C. 8 242 – De | privation of Rights Under Color |
| 13 | v. | of Law | rwcr.ragaa caaca |
| 14 | ADEDEJI SHAMONDA, | SAN FRANCISCO VEN | UE |
| 15 | Defendant. |)) | |
| 16 | |)) | |
| 17 | | | |
| 18 | <u>I N D I</u> | CTMENT | |
| 19 | The Grand Jury charges: | | |
| 20 | General Allegations | | |
| 21 | At all times relevant to this Indictment: | | |
| 22 | 1. The defendant Adedeji Shamond | da was employed as an | airport screener at the San |
| 23 | Francisco International Airport (SFO). | | |
| 24 | 2. Victim 1 and Victim 2 were pass | engers at SFO. | |
| 25 | <u>COUNT ONE</u> : (18 U.S.C. § 242 – Depri | ivation of Rights Under | Color of Law) |
| 26 | Paragraphs 1 and 2 of this Indictment ar | e re-alleged and incorpo | orated as though fully set forth |
| 27 | herein. | | |
| 28 | On or about September 21, 2023, at SFO, | , in San Mateo County, (| California, within the Northern |
| | INDICTMENT | | |

| 1 | District of California, the defendant, | | | |
|----|--|--|--|--|
| 2 | ADEDEJI SHAMONDA, | | | |
| 3 | while acting under color of law, willfully deprived Victim 1 of the rights, secured and protected by the | | | |
| 4 | Constitution and laws of the United States, to be free from unreasonable searches and seizures and to no | | | |
| 5 | be deprived of property without due process of law by a person acting under color of law. In so doing | | | |
| 6 | Shamonda unlawfully stopped and restrained Victim 1, searched Victim 1's person and her belongings | | | |
| 7 | and stole money from Victim 1. | | | |
| 8 | All in violation of Title 18, United States Code, Section 242. | | | |
| 9 | COUNT TWO: (18 U.S.C. § 242 – Deprivation of Rights Under Color of Law) | | | |
| 10 | Paragraphs 1 and 2 of this Indictment are re-alleged and incorporated as though fully set fort | | | |
| 11 | herein. | | | |
| 12 | On or about September 21, 2023, at SFO, in San Mateo County, California, within the Northern | | | |
| 13 | District of California, the defendant, | | | |
| 14 | ADEDEJI SHAMONDA, | | | |
| 15 | while acting under color of law, willfully deprived Victim 2 of the right, secured and protected by the | | | |
| 16 | Constitution and laws of the United States, to be free from unreasonable searches and seizures by a | | | |
| 17 | person acting under color of law. In so doing, Shamonda unlawfully stopped and restrained Victim 2 | | | |
| 18 | and searched Victim 2's person and his belongings. | | | |
| 19 | All in violation of Title 18, United States Code, Section 242. | | | |
| 20 | | | | |
| 21 | DATED: June 11, 2024 A TRUE BILL. | | | |
| 22 | | | | |
| 23 | /s/ Grand Jury Foreperson FOREPERSON | | | |
| 24 | TOKEI EKSON | | | |
| 25 | ISMAIL J. RAMSEY United States Attorney | | | |
| 26 | Chica Saids Midiley | | | |
| 27 | /s/ Michael G. Lagrama | | | |
| 28 | MICHAEL G. LAGRAMA Assistant United States Attorney | | | |
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INDICTMENT